UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

SM FINANCIAL SERVICES	§
CORPORATION, as assignee of	§
NEIGHBORS GP, LLC et al.	§
	§
Plaintiffs,	§ Civil Action No. 3:20-cv-01885-M
v.	§ (consolidated with Case No. 3:20-
	§ cv-2017-X)
HEALTH CARE SERVICE	§
CORPORATION, a Mutual Legal	§
Reserve Company, d/b/a BLUE CROSS	§
BLUE SHIELD OF TEXAS, et al.	§
	§
Defendants.	§

PLAINTIFFS' REPORT ON STATUS OF SERVICE

TO THE HONORABLE U.S. CHIEF DISTRICT JUDGE BARBARA M. G. LYNN:

NOW COME Plaintiffs SM Financial Services Corporation, as assignee of Neighbors GP, LLC et al. ("Plaintiffs"), and pursuant to the Court's Order Requiring Plaintiffs to file a report on the status of service, submit the following report:

There are sixty-one (61) Blue Cross Blue Shield entities that are defendants in this case. Since filing this suit, Plaintiffs have worked diligently to obtain service of process and have served all entities except for the following entities, a status of which is provided for each:

- Defendant Premera Blue Cross Blue Shield of Alaska Plaintiffs have been unable to serve as the entity is operating remotely due to the Pandemic.
- 2. Defendant Blue Cross Blue Shield of California Plaintiffs are unable to serve registered agent, who refuses to accept service due to titling on summons.

- 3. Defendant Hawaii Medical Service Association d/b/a Blue Cross Blue Shield of Hawaii
 - Plaintiffs have successfully served entity and are awaiting documentation of service.
- 4. Defendant Blue Cross Blue Shield of Puerto Rico Plaintiffs continue to make attempts to complete service.
- 5. Defendant Blue Cross Through Can Assistance Plaintiffs are working to obtain service through counsel.
- 6. Plaintiffs have served all other Defendants.

Additionally, Plaintiffs believe that a settlement conference may be useful in resolving the matter globally, or partially. As such, the Plaintiffs would respectfully request that the Court set a date for a settlement conference on the outstanding claims with the remaining Defendants.

Respectfully Submitted,

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